

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.,

Defendant.

Case No. 2:22-cv-00125-JRG

JURY TRIAL DEMANDED

**DECLARATION OF JAMES A. SHIMOTA IN SUPPORT OF
ENTROPIC'S MOTION TO STRIKE OPINIONS OF STEVEN GOLDBERG**

I, James A. Shimota, declare:

1. I am a Partner with the law firm of K&L Gates LLP, and I am counsel of record for Plaintiff Entropic Communications, LLC (“Entropic”) in the above-captioned matter. I am submitting this declaration in support of Entropic’s Motion to Strike Opinions of Steven Goldberg. I have personal knowledge of the matters stated herein and, if called to testify to such matters, I could and would testify hereto.

2. Attached as Exhibit A is a true and correct copy of Defendant’s Opening Expert Report of Steven H. Goldberg Regarding Invalidity (“Opening Report” or “Op. Rep.”), which was served on Entropic on July 21, 2023.

3. Attached as Exhibit B is a true and correct copy of selected excerpts of the deposition transcript of Steven H. Goldberg, which was taken on August 22, 2023.

4. Attached as Exhibit C is a true and correct copy of Defendant’s Supplemental Expert Report of Steven H. Goldberg Regarding Invalidity (“Supplemental Report” or “Supp. Rep.”), which was served on August 14, 2023.

5. Attached as Exhibit D is a true and correct copy of Defendant’s Third Supplemental Invalidity and Subject-Matter Eligibility Contentions (“Invalidity Contentions” or “Inv. Cont.”), which were served on July 21, 2023.

6. Attached as Exhibit E is a true and correct copy of Defendant’s Initial Invalidity and Subject-Matter Eligibility Contentions (“Initial Inv. Cont.”), which were served on September 2, 2022.

7. Attached as Exhibit F is a true and correct copy of Defendant’s First Supplemental Invalidity and Subject-Matter Eligibility Contentions (“1st Supp. Inv. Cont.”), which were served on June 23, 2023.

I certify under penalty of perjury under the laws of the United States that the foregoing statements are true and correct. Signed this 11th day of September, 2023.

/s/ James A. Shimota
James A. Shimota